

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

SHARON GOODEN,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 12-00286-CV-W-DGK
	)	
CITY OF NORTH KANSAS CITY,	)	
MISSOURI, et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' SECOND MOTION FOR EXTENSION OF TIME TO FILE  
JOINT REPORT ON DISCOVERY CONFERENCE  
AND PROPOSED SCHEDULING ORDER**

COME NOW Defendants City of North Kansas City and Clay County, by and through their undersigned counsel of record, pursuant to Fed. R. Civ. P. 6(b), and respectfully move this Court to enter a second enlargement of time allowing the parties through and until July 30, 2012, in which to file their Joint Proposed Scheduling Order and Discovery Plan. As grounds for their Motion, Defendants state and allege to the Court as follows:

1. On May 18, 2012, this Court issued its Order (Doc. No. 31) setting July 2, 2012, as the deadline for the parties to file their Joint Proposed Scheduling Order and Discovery Plan.
2. On July 2, 2012, Defendants filed their original Motion seeking additional time to file that Joint pleading.
3. On July 3, 2012, this Court issued its Order (Doc. No. 39), allowing the parties through and until July 23, 2012, in which to file their joint proposed scheduling Order.
4. On July 17, 2012, Plaintiff (who is proceeding pro se) and Defendants' counsel again conferred by telephone about the content of the Joint pleading, and on July 18, 2012, Defendants'

counsel sent a letter to Plaintiff asking her to review the revised document and to advise in writing whether Defendants' counsel had her consent to file it with the Court. A copy of Defendants' counsel's July 18, 2012, letter to Plaintiff Gooden is attached as Exhibit A.

5. As of July 23, 2012, Defendants' counsel has not heard back from Plaintiff and has not received written consent to file the document.

6. Defendants' undersigned counsel believes the parties have reached agreement with regard to the content of the Joint Report, but until written confirmation is received from Plaintiff, Defendants' counsel is not able to file the document as a Joint pleading.

7. Based on the foregoing, Defendants' undersigned counsel seeks a one-week extension of time in which to file the Joint report. It is hoped this brief extension will be sufficient for Plaintiff to either give written confirmation to the filing of the Joint pleading or to request additional changes thereto.

8. Pursuant to Fed. R. Civ. P. 6(b), this Court is empowered to grant the relief sought herein.

WHEREFORE, based upon the above and foregoing, Defendants respectfully pray this Court to issue its Order allowing the parties through and until July 30, 2012, in which to file their Joint Report on Discovery Conference and Proposed Scheduling Order, together with such other and further relief as this Court deems just and appropriate.

Respectfully submitted,

FISHER, PATTERSON, SAYLER & SMITH, LLP

/s/ David S. Baker

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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of July, 2012, I electronically filed the above and foregoing with the Clerk of the Court using the CM/ECF system. I further certify that I have caused to be served on the following a true and correct copy of the above and foregoing by depositing same in the United States Mail, postage prepaid, on the 23<sup>rd</sup> day of July, 2012:

Sharon Gooden

P.O. Box 15301

Shawnee Mission, KS 66285

*Pro Se Plaintiff*

/s/ David S. Baker

DAVID S. BAKER